

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JACKIE FISHER,)
)
Plaintiff,)
)
VS.) C.A. NO. 4:08-cv-01273
)
UNIVERSITY OF TEXAS MEDICAL)
BRANCH and DAVID WATSON,)
)
Defendants.)

ORAL DEPOSITION OF
DAVID W. WATSON
AUGUST 28, 2009

ORAL DEPOSITION OF DAVID W. WATSON, produced as a witness at the instance of the Plaintiff, and duly sworn, was taken in the above-styled and numbered cause on August 28, 2009, from 10:43 a.m. to 4:13 p.m., before Lorri Lucas, CSR in and for the State of Texas, reported by machine shorthand, at the offices of TDCJ Conference Center, Huntsville, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.



1 A All except the building.

2 Q Okay. All except the building. Who was
3 in charge of the building?

4 A I believe it was Joyce Bonds.

5 Q And what went on in the building?

6 A Oh, they had their own little medical
7 clinic. I think they a two-bed ER and some exam
8 rooms.

9 Q And Joyce Bond was a nurse manager?

10 A She was the only nurse manager.

11 Q All right.

12 A And by way of distinction, Ms. Fisher was
13 a cluster nurse manager. Now, even though the
14 Estelle Unit wasn't scattered out geographically
15 over two or three counties as some of them were, it
16 was so big that it was considered -- or that
17 position was a cluster nurse manager position.
18 Ms. Bonds was a nurse manager position, which would
19 be like a step below.

20 Q And as a cluster nurse manager, Ms. Fisher
21 didn't have any responsibilities that extended
22 beyond the Estelle Unit at that time.

23 A She was responsible for everything except
24 the building.

25 Q Okay.